

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LISA LAMBERT,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO:
	:	96 CV. 247 Erie
v.	:	
	:	Magistrate Judge BAXTER
	:	
SUPERINTENDENT WILLIAM WOLFE,	:	
et al.,	:	(Filed via ECF)
	:	
Defendants.	:	
	:	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO COMPLETE DISCOVERY**

Plaintiff respectfully moves for an extension of time of 30 days to complete discovery, and that the deadlines for dispositive motions be changed to dates following the close of discovery, for the following reasons:

1. Discovery in this case is scheduled to close on June 15, 2006;
2. The parties have diligently pursued completion of discovery, and have nearly completed all discovery;
3. This case was administratively closed on July 14, 2000, and reopened on January 25, 2006, and parties require additional time to fulfill discovery requests to update the record as of the time the case was administratively closed;
4. Defendants' counsel consents to granting this motion;
5. This motion is not intended to nor will it unnecessarily delay these proceedings.

Therefore, it is respectfully requested that an enlargement of time to July 17, 2006 be provided to complete discovery in this matter.

Respectfully submitted,

/s/Angus Love

Angus Love, ID # 22392
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924 Cherry Street, Suite 523
Philadelphia, PA 19107
(215) 925-2966

Date: June 14, 2006

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LISA LAMBERT,

Plaintiff,

V.

SUPERINTENDENT WILLIAM WOLFE,
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Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Consent Motion For Extension of Time To Complete Discovery was served upon the following via first-class mail:

Kemal Alexander Mericli
Office of the Attorney General
564 Forbes Avenue
6th Floor, Manor Complex
Pittsburgh, PA 15219

Rob Willig
Office of the Attorney General
564 Forbes Avenue
6th Floor, Manor Complex
Pittsburgh, PA 15219

Respectfully submitted,

/s/Angus Love

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